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**April 17, 2019**

**Via ECF**

Hon. A Kathleen Tomlinson, USMJ  
United States District Court, EDNY  
100 Federal Plaza, Courtroom 910  
Central Islip, NY 11722  
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**Re: Margarita Gonzalez v. Talon Air Inc., and Adam Katz**  
**Case No. 18-CV-4415 (ADS)(AKT)**  
**Discovery Status Report**

Dear Magistrate-Judge Tomlinson:

My firm represents plaintiff in the above-referenced action, and I respectfully write to provide the Court with a discovery status report as per Your Honor's November 28, 2018 order.

- 1. confirming that all paper production has been completed and that any Objections to each other's productions have been resolved (and if not, state why not);**

Paper production has not been completed. Plaintiff served request for documents and interrogatories on December 10, 2018. Defendants have not yet provided responses. We have no record of receiving any discovery requests from Defendants.

- 2. confirming that each party's interrogatory responses have been certified by the client as to their accuracy and completeness and that any objections to each other's interrogatory responses have been resolved (and if not, state why);**

Plaintiff served interrogatories on December 10, 2018. As of the date of this status report, we have not yet received Defendants responses. Defendants have not served interrogatories on Plaintiff.

- 3. stating whether there are any outstanding discovery disputes; if so, each attorney must set forth the legal support for the position being taken on behalf of the client (i.e., provide the case citations for any cases relied upon to support the argument being made on behalf of the client and further state the proposition from that case which counsel asserts supports his/her argument); and**

Defendants have not yet responded to Plaintiff's discovery requests.

- 4. confirming that counsel have conferred with each other and reached an agreement concerning whom they wish to depose in the case, including both party and non-party witnesses and providing an the date on which the last deposition is scheduled to be taken.**

Plaintiff intends to depose the two defendants in the case along with any other persons who have knowledge of the claims made by Plaintiff in this action. The lack of responses from Defendants is an impediment to further discovery such as depositions.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**cc: Defense Counsel via ECF**